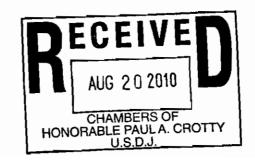
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| HARPA SHIPPING & CHARTERING GMBH & CO KG "MIDDLE EAST BULK," | A hatul huand is grant prespect Continuously and be like thin So order Case No. 10 CV 5792(PAC) |
| Petitioner, v. | : NOTICE OF MOTION FOR : ENTRY OF JUDGMENT : RECOGNIZING FOREIGN |
| EMIRATES TRADING AGENCY (L.L.C.), | : ARBITRAL AWARD : |
| Respondent. | : |

PLEASE TAKE NOTICE that upon the Amended Petition to Recognize, Confirm and Enforce Foreign Arbitral Award, the Supplemental Declaration of Christopher Carlsen dated August 19, 2010, and the Exhibits attached thereto, and the Supplemental Memorandum of Law dated August 19, 2010, and upon all prior pleadings and proceedings heretofore had herein, Petitioner Harpa Shipping & Chartering GmbH & Co KG "Middle East Bulk" will move this Court, before the Honorable Paul A. Crotty, at a time and date to be established by the Court, for the entry of judgment against Respondent Emirates Trading Agency recognizing a Final London Arbitration Award entered on July 7, 2010, and a Second Final Award entered on August 11, 2010, in favor of Petitioner and against Respondent, together with such other and further relief as the Court may deem just and proper.

Dated: New York, New York August 19, 2010



Case 1:10-cv-05792-PAC Document 14 Filed 10/05/10 Page 2 of 3

Respectfully submitted,

CLYDE & CO US LLP

 $By_{\underline{}}$

Christopher Carlsen

405 Lexington Avenue New York, New York 10174 (212) 710-3930

Attorneys for Petitioner



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Christopher.Carisen@clydeco.us

September 20, 2010

Via Facsimile: (212) 805-6304

Honorable Paul A. Crotty United States District Court Daniel Patrick Moynihan United States Courthouse 500 Pearl Street New York, NY 10007

Harpa Shipping & Chartering GmbH & Co KG "Middle East Bulk" v. Re:

Emirates Trading Agency (L.L.C.) Index No.: 10 CV 5792 (PAC) Clyde & Co. Ref: 0903956/001

Dear Judge Crotty:

We represent the Petitioner Harpa Shipping & Chartering GmbH & Co KG "Middle East Bulk" in this proceeding to recognize, confirm and enforce London arbitration awards entered in favor of Petitioner and against Respondent Emirates Trading Agency (L.L.C.) ("ETA"). On August 30, 2010, we served and filed Petitioner's Notice of Motion for Entry of Judgment Recognizing Foreign Arbitral Awards and supporting documents.

Respondent ETA's time to file and serve its response to this motion expired on Finday, September 17, 2010. and ETA did not file any opposition papers or in any other way respond to the motion. Accordingly, we respectfully request that the Court grant Petitioner's motion and enter Judgment on the awards in favor of Petitioner

Christopher Carlson

CC/mv

Respectfu

Michael E. Unger, Esq. (Via Fax: (212) 425-1901) CC:

Freehill Hogan & Mahar, LLP

80 Pine Street

New York, NY 10005

Agent for Service of Process for Emirates Trading Agency (L.L.C.)